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**Regulation of Foreign Commerce.**—The United States Circuit Court of the Southern District of New York, in *Thomson v. Union Castle Mail S. C. Co.*, 149 Federal Reporter, 933, takes the position that the Sherman Anti-Trust Law does not apply to combinations by shipowners navigating between ports of the United States and those of foreign countries, and does not prevent the giving of rebates by such shipowners.

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**Extradition.**—On authority of *Rauscher*, 119 United States, 407, 7 Supreme Court Reporter, 234, the United States Circuit Court for the Southern District of New York, in *Ex parte Browne*, 148 Federal Reporter, 68, holds that a person who has been extradited by a foreign government under a charge of having committed a particular offense cannot, on his return to this country, and while he is in charge of the extradition officer, be arrested and imprisoned on a warrant based on a former conviction for another offense. Under the case cited and the acts of Congress bearing on the subject, the court holds that no one should be "detained" for a crime other than that for which he was extradited.

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**Eyewitness of Accident.**—In *Lewis v. Brotherhood Accident Co.*, 79 Northeastern Reporter, 802, it appeared that insured, along with a young lady, was canoeing on the river, and that there were two witnesses in a skiff on the river, rowing in an opposite direction. The occupants of the canoe recognized the witnesses on passing, and otherwise showed themselves to be in good spirits. Upon the canoe passing around a bend in the river, the witnesses heard a cry, but did not turn back. Later in the day the upturned canoe was found, and various articles which were in the canoe were found floating near. The insurance company defended the action on the ground that there was no eyewitness to the accident, within a provision limiting the company's liability in case the facts and circumstances of the accident were not established by eyewitnesses, but the Supreme Judicial Court of Massachusetts, deciding the case, was of the opinion that the witnesses were sufficient eyewitnesses to the accident within the meaning of the policy.

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**Duty to Pay Interest on Insanity of Creditor.**—According to the decision of Pennsylvania Supreme Court in *Gorgas v. Saxman*, 65 Atlantic Reporter, 619, a debtor is not excused from paying interest on a debt because he believes the creditor insane. It was urged that the good faith of the debtor in making an effort to ascertain the mental condition of the creditor, and in relying on such information, was shown by the subsequent proceedings, in which the debtor was found to be of a weak mind, and a guardian appointed, but the court states that a proceeding of that nature is different in scope and character from one *de lunatico inquirendo*.